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September 9, 2002

Via Electronic Filing
Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Re: Application by Qwest Communications International, Inc., for Authorization to Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota, Docket No. 02-148.

Application by Qwest Communications International, Inc., for Authorization to Provide In-Region InterLATA Services in the States of Montana, Utah, Washington and Wyoming, Docket No. 02-189.

Dear Ms. Dortch:

On Friday September 6, 2002, David Lawson of Sidley Austin Brown & Wood, Len Cali, and I met with Monica Desai, Commissioner Martin's Acting Legal Adviser for these proceedings, and Emily Willeford, Commissioner Martin's Special Assistant, to discuss issues related to the aforementioned proceedings. We urged the Commission to reject the Qwest applications for failure to comply with the requirements of the Section 271 checklist as well as on public interest grounds.

First, we explained that Section 272 (b) (2) and (5) and section 272(c)(2) require that this Commission find that Qwest has conducted its affilate transactions and kept its books and records in the manner prescribed by the Commission. Qwest's incorrect affidavits filed at the ouset of the proceedings asserting that its long distance affilate's books and records had been kept in accordance with Generally Accepted Accounting Principles and its most recent

statements that it cannot make that certification now compel the Commission to deny this application.

We also explained that Qwest's August 20 proposal to file some of the secret Interconnection Agreements in its region did not cure the discrimination issues caused by Qwest's secret deals, nor did the proposal remove the qualification that KPMG affirmatively made on its third party OSS test results because of the potential that those results were tainted by preferential treatment given to CLEC secret deal recipients. Finally, we pointed to the fact that serious deficiencies remain with respect to Qwest's operational support systems and pricing of unbundled network elements that individually require the Commission to find that the checklist has not been met and that the public interest would not be served by granting the referenced applications.

The positions expressed by AT&T were consistent with those contained in the Comments and ex parte filings previously made in the aforementioned dockets. Two copies of this Notice are being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Sincerely,

Robert W. Zuinny.

cc: Monica Desai

Emily Willeford